

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>ACRISURE, LLC d/b/a UPSTREAM BROKERS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>C.A. No.      4:19-cv-00662</b>
	)	
<b>EDGEWOOD PARTNERS INSURANCE CENTER d/b/a/ EPIC INSURANCE BROKERS AND CONSULTANTS, JOSE PALMER, and NIKKI HOWES,</b>	)	
	)	
<b>Defendants.</b>	)	

**ACRISURE, LLC’S MOTION FOR EXPEDITED HEARING**

Plaintiff Acrisure, LLC (“Acrisure”) moves this Court for an Order expediting the hearing on its Verified Application for Temporary Restraining Order and Preliminary Injunction and, Complaint (Doc. 1), and in support thereof, avers as follows:

1. On February 25, 2019, Acrisure filed the Verified Application for Temporary Restraining Order and Preliminary Injunction and, Complaint (Doc. 1), which is hereby incorporated by reference, seeking to protect its interests from exploitation and misappropriation and to enjoin Defendants Jose Palmer, Nikki Howes, and Edgewood Partners Insurance Center d/b/a/ EPIC Insurance Brokers and Consultant (“EPIC”) from misappropriating Acrisure’s Confidential Information and Trade Secrets (as that term is defined in the Verified Application for TRO and Complaint) and breaching their confidentiality obligations with Acrisure.
2. Palmer’s and Howes’ unlawful conduct, including their misappropriation of Acrisure’s files which include highly confidential and trade secret information, is causing and will continue to cause Acrisure irreparable harm.

3. Because of the critical nature of Acrisure's injury, to protect Acrisure's Confidential Information and Trade Secrets, and to preserve the status quo as it existed before Palmer's and Howes' improper actions, Acrisure requests an expedited hearing on its Application for Temporary Restraining Order and Preliminary Injunction.

4. An expedited hearing will not prejudice the Defendants.

WHEREFORE, Acrisure requests that the Court set a hearing date on its Verified Application as soon as practicable and convenient for the court.

Dated: February 26, 2019

SHOOK, HARDY & BACON

By: /s/ Tanya L. Chaney

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